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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED  
 TELEPHONY CONSULTANTS, MRZ  
 MANAGEMENT, LLC, DONOR  
 RELATIONS, LLC, TPFE, INC., AMERICAN  
 TECHNOLOGY SERVICES, COMPLIANCE  
 CONSULTANTS, CHROME BUILDERS  
 CONSTRUCTION, INC., and UNIFIED  
 DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and  
 JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO  
 EXTEND TIME TO FILE RESPONSE  
 TO PLAINTIFFS' OBJECTION TO  
 MAGISTRATE JUDGE'S REPORT AND  
 RECOMMENDATION DENYING  
 PLAINTIFFS' MOTION TO AMEND  
 AND SUPPLEMENT COMPLAINT**

**(FIRST REQUEST)**

Pursuant to Local Rules IA 6-1, IB 3-2, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced  
 Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American  
 Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified  
 Data Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and  
 through their respective undersigned counsel of record, submit this Stipulation and Proposed  
 Order for a 2-week extension of BANA's deadline to file its response to Plaintiffs' Objection to  
 Magistrate Judge's Report and Recommendation Denying Plaintiffs' Motion to Amend and

Supplement Complaint (ECF No. 214) (the "Objection"). The Objection was filed on November 18, 2021. No hearing date is set. The Parties request an extension from December 2, 2021, BANA's current deadline to respond, to December 16, 2021.

This is the Parties' first request for an extension of the briefing deadlines for the Objection and is not intended to cause any delay or prejudice to any party. The reason for the extension is to give the Parties time to evaluate and respond to the arguments set forth in the Objection.

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time for BANA to file their response to the Objection is extended to and through December 16, 2021.

**IT IS SO STIPULATED.**

Dated: December 1, 2021

Dated: December 1, 2021

THE BERNHOFT LAW FIRM, S.C.

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*Attorneys for Plaintiffs*

**IT IS SO ORDERED.**

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 7th day of December, 2021.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO PLAINTIFFS' OBJECTION TO MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION DENYING PLAINTIFFS' MOTION TO AMEND AND SUPPLEMENT COMPLAINT (FIRST REQUEST)** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: December 1, 2021

/s/ Maricris Williams  
An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer

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